

FILED

08 DEC 17 AM 10:24

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACK HOOKS,

Defendant.

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**1:08 CR 517**  
CR NO.

Title 29, United States Code  
Sections 439(c) and 501

**JUDGE ECONOMUS**

COUNT 1

The Grand Jury charges:

1. At all times relevant to this Indictment, Chapter 7010 of the Ohio Civil Service Employees Association (OCSEA), Local 11 of American Federation of State, County, and Municipal Employees (AFSCME), was a labor organization engaged in an industry affecting commerce, within the meaning of Sections 402(i) and (j) of Title 29, United States Code. OCSEA Chapter 7010 was a subordinate chapter of OCSEA (AFSCME Local 11), which represented corrections officers at the Mansfield Correctional Institution (MANCI), Mansfield, Ohio.

- 2 -

2. At all relevant times to this Indictment, the defendant, JACK HOOKS, was the Treasurer of OCSEA Chapter 7010.

3. From on or about December 23, 2003, through on or about January 2, 2005, in the Northern District of Ohio, Eastern Division, the defendant, JACK HOOKS, while an officer, that is, Treasurer of OCSEA Chapter 7010, did embezzle, steal and unlawfully and willfully abstract and convert to his own use and the use of another the moneys, funds, and assets of said labor organization in the approximate amount of \$15,192.

In violation of Title 29, United States Code, Section 501(c).

COUNT 2

The Grand Jury further charges:

1. The allegations in paragraphs 1 and 2 of Count 1 are incorporated and re-alleged in this paragraph, as if fully rewritten herein.

2. During the period between approximately June 30, 2004, through November 4, 2004, in the Northern District of Ohio, Eastern Division, the defendant, JACK HOOKS, did willfully make and cause to be made a false entry in a record required to be maintained by Section 436 of Title 29, United States Code, that is minutes of OCSEA Chapter 7010 Executive Board and Chapter meetings on June 29, 2004, submitted to OCSEA headquarters, which falsely stated that the Executive Board had passed a "Motion to allocate \$10,000 at the Treasurer's discretion to interest bearing account," when, in fact, no such motion was passed at that meeting.

In violation of Title 29, United States Code, Section 439(c).

- 3 -

COUNT 3

1. The allegations in paragraphs 1 and 2 of Count 1 are incorporated and re-alleged in this paragraph, as if fully rewritten herein.

2. During the period between approximately June 30, 2004, through November 4, 2004, in the Northern District of Ohio, Eastern Division, the defendant, JACK HOOKS, did willfully make and cause to be made a false entry in a record required to be maintained by Section 436 of Title 29, United States Code, that is an Intermediate Body Quarterly Financial Statement of OCSEA Chapter 7010, for the calendar quarter ended June 30, 2004, which falsely stated that Chapter 7010 had \$6,500 deposited in an interest bearing certificate as of the end of the quarter (referred to in the financial statement as a “CD,” “interest/savings cert.,” and “interest cert.”) when, in fact, Chapter 7010 did not have such an interest bearing certificate.

In violation of Title 29, United States Code, Section 439(c).

A TRUE BILL.